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5 **Attorneys for Plaintiff(s),**  
[CLIENT'S NAME]

6 [LAW FIRM NAME]  
7 [ATTORNEY'S NAME] (State Bar No. [#])  
[Street Address]  
8 [City, State & Zip Code]  
Telephone: [xxx.xxx.xxxx]  
9 Facsimile: [xxx.xxx.xxxx]

10 **Attorneys for Defendant(s),**  
[DEFENDANT'S NAME]

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12 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
13 **COUNTY OF [COUNTY ], [DISTRICT]**  
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15 [PLAINTIFF(S)], an individual,  
16 Plaintiff,  
17 vs.  
18 [DEFENDANT(S)], and DOES 1 to [#],  
inclusive,  
19 Defendants.

Case No. [ ]

**PRE-TRIAL STIPULATIONS IN LIEU  
OF MOTIONS IN LIMINE**

FSC Date: [ ]  
Trial Date: [ ]

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21 **TO THE COURT, ALL PARTIES AND THEIR COUNSEL OF RECORD:**

22 PLEASE TAKE NOTICE that Plaintiff [CLIENT'S NAME] ("Plaintiff") and  
23 Defendant [DEFENDANT'S NAME] ("Defendant"), provide the following Pre-trial  
24 Stipulations in Lieu of Motions in Limine for trial in the above-captioned matter:

25 IT IS HEREBY STIPULATED by and between counsel for Plaintiff, and counsel  
26 for Defendant, as follows:

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1. Defendant, [Defendant's Name], was negligent, with respect to duty and breach, in the operation of his vehicle in causing the subject accident.

2. Plaintiff, [Plaintiff's Name], was not negligent in the operation of her vehicle with regard to the subject accident.

DATED: May 23, 2018

**SELARZ LAW CORP.**

By: \_\_\_\_\_  
Daniel E. Selarz, Esq.  
**Attorneys for Plaintiff(s),**  
[Client's Name(s)]

DATED: May 23, 2018

**[FIRM NAME]**

By: \_\_\_\_\_  
[Attorney Name], Esq.  
**Attorneys for Defendant,**  
[Defendant's Name(s)]